

1 James P. Laurick, OSB # 821530
jlaurick@kilmerlaw.com
2 Alisa D. Hardy, OSB # 105886
ahardy@kilmerlaw.com
3 Kilmer, Voorhees & Laurick, P.C.
Attorneys at Law
4 732 N.W. 19th Avenue
Portland, Oregon 97209-1302
5 Telephone: (503) 224-0055
Fax: (503) 222-5290
6 OF ATTORNEYS FOR FREE BREEZE
7 ENERGY SYSTEMS, LTD.

Case No. 14-35766-RLD7
Adv. Proc. No.
Chapter 7
COMPLAINT
(Determine Dischargeability of Debt)

21 Plaintiff Free Breeze Energy Systems, Ltd. (“Free Breeze”) alleges as follows:

Nature of the Action

1.

24 This is an adversary proceeding by Free Breeze against defendant debtor Henrik
25 Norremark (“Debtor”) to determine the dischargeability of a debt.

26 ///

Page 1 - COMPLAINT

KILMER, VOORHEES & LAURICK, P.C.
A PROFESSIONAL CORPORATION
732 N.W. 19TH AVENUE
PORTLAND, OREGON 97209-1302
(503) 224-0055 • FAX (503) 222-5290

1 2.

2 Debtor is an Oregon resident and seeks a Chapter 7 discharge in the United States
3 Bankruptcy Court for the District of Oregon, Case No. 14-35766-RLD7. Debtor is also
4 President of R&N US Holdings, Inc.

3.

6 Free Breeze is a foreign corporation and a creditor in the main bankruptcy case captioned
7 above. John Hogg (“Hogg”) is the President of Free Breeze.

Jurisdiction and Venue

9 4.

This court has jurisdiction over this proceeding under 28 U.S.C. § 1334(b), 11 U.S.C. §523, and Federal Rule of Bankruptcy Procedure 7001(6).

12 5.

13 This is a core proceeding under 28 U.S.C. §157(b)(2)(I) and (O). In the event any claim
14 for relief is not a core proceeding, Free Breeze hereby consents to determination of these claims
15 by this Court.

16. 6.

¹⁷ Venue is proper under 28 U.S.C. § 1409(a).

Allegations

19 7.

20 Free Breeze is a creditor of debtor by reason of a general judgment rendered in the
21 Circuit Court of Oregon for the County of Multnomah, Case No. 1401-00987.

22 8.

23 On or about March 2012, debtor requested a loan from Free Breeze and Hogg. To obtain
24 said loan, debtor misrepresented his employment status, what the funds were to be used for, and
25 that the indebtedness would be repaid with proceeds from the sale of real property he owned.
26 Debtor failed to disclose that he had been fired and was under investigation for embezzlement.

9.

2 Debtor's representations were materially false and made with the intent to deceive Free
3 Breeze into loaning money to Debtor.

10.

5 Free Breeze reasonably relied upon the debtor's statements to its detriment by executing
6 a Promissory Note and loaning Debtor \$600,000.

11.

The entire debt together with interest and attorney fees remains outstanding.

WHEREFORE, Free Breeze prays for

- a. A determination that the indebtedness of Debtor to Free Breeze is nondischargeable;
- b. Interest, attorney fees and costs; and
- c. Such other and further relief as is just and proper.

DATED this 22nd day of May, 2015.

KILMER, VOORHEES & LAURICK, P.C.

/s/ James P. Laurick

James P. Laurick, OSB #
15-1-1211-1

jlaurick@kilmerlaw.com

Alisa D. Hardy, OSB # 105525
ahardy@kilmerlaw.com

ahardt@kilmerlaw.com
Phone No.: 503.224.0055

Phone No.: 503-224-0055
Fax No.: 503-222-5290

Fax No.: 503-222-5290
Of Attorneys for Free Breeze Energy Systems

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Page 3 - COMPLAINT

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CERTIFICATE OF SERVICE

I certify that on this 22nd day of May, 2015, the foregoing COMPLAINT will be served in accordance with the Court's CM/ECF system which will send notification of such filing by via email to the ECF participants of record a true copy of the foregoing document, and so served on the following by [] hand delivery [] overnight delivery [] fax [X] email [X] by depositing with the U.S. mail in Portland, Oregon, enclosed in a sealed envelope with class postage prepaid. Addressed as follows:

Ted A. Troutman, OSB # 844470
Troutman Law Firm, PC
5075 SW Griffith Dr., Ste. 220
Beaverton, OR 97005
Phone: (503) 292-6788
Fax: (503) 596-2371
Email: tedtroutman@sbcglobal.net
Of Attorneys for Debtor Henrik Norremark

KILMER, VOORHEES & LAURICK, P.C.

/s/ James P. Laurick
James P. Laurick, OSB # 821530
jlaurick@kilmerlaw.com
Alisa D. Hardy, OSB # 105886
ahardy@kilmerlaw.com
Of Attorneys for Free Breeze En

Page 1 - CERTIFICATE OF SERVICE

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